

## **EXHIBIT A**

**UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH CAROLINA  
SPARTANBURG DIVISION**

JANE DOES 1-9,

Plaintiffs,

vs.

COLLINS MURPHY, SHARON  
HAMMONDS, BRENDA F. WATKINS,  
LIMESTONE UNIVERSITY, MG  
FREESITES, LTD., d/b/a PORNHUB.COM,  
MG FREESITES II LTD., MINDGEEK  
S.A.R.L., MINDGEEK USA, INC., MG  
BILLING LTD., and HAMMY MEDIA LTD.  
d/b/a XHAMSTER.COM, TRAFFICSTARS  
LTD., WISEBITS LTD, XHAMSTER IP  
HOLDINGS LTD, WISEBITS IP LTD.,

Defendants.

Case No.: 7:20-cv-00947

**AFFIDAVIT OF ESTEFANIA ZAPATA**

JANE DOE,

Plaintiff,

vs.

LIMESTONE UNIVERSITY F/K/A  
LIMESTONE COLLEGE, COLLINS  
MURPHY, MG FREESITES, LTD., d/b/a  
PORNHUB.COM, and HAMMY MEDIA,  
LTD. d/b/a XHAMSTER.COM,

Defendants.

Case No.: 7:21-cv-03193

**AFFIDAVIT OF ESTEFANIA ZAPATA**

1. I am Estefania Zapata. I am over the age of eighteen years of age, am a resident of Osceola County and hereby affirm upon oath and affirmation that the following matters, facts, and statements are true and correct to the best of my knowledge.

2. I am a paralegal at Metcalfe & Atkinson, LLC. I have been employed as a paralegal handling federal civil and criminal matters for Hannah Rogers Metcalfe and Courtney

C. Atkinson since May 2017. I am writing this Affidavit to confirm the timely actions taken when electronically filing Wisebits IP, LTD's Motions for Protective Orders in the above-referenced matters.

3. As the civil law paralegal, I was "assigned" the case for Wisebits IP, LTD when Hannah Rogers Metcalfe was engaged as local counsel for Wisebits IP, LTD.

4. As part of my assignment, I am responsible for preparing the pleadings for electronic filing with the District Court via ECF.

5. On February 28, 2024 around 10:35 p.m., I commenced to assist Mrs. Metcalfe with the preparation and electronic filing of Wisebits IP, LTD's Motions for Protective Order.

6. Around 11:40 p.m., when attempting to electronically file the Motions for Protective Order with the District Court, I started receiving a filing error that did not allow me to successfully complete the filings. A screenshot of the error message I received is attached hereto as Exhibit A.


7. Given that I kept receiving this error repeatedly, I informed Mrs. Metcalfe of such error around 11:55 p.m. after multiple unsuccessful attempts to resolve the problem with the ECF system.

8. I was able to complete both electronic filings at 12:13 a.m. and 12:14 a.m.

**FURTHER, AFFIANT SAYETH NOT.**

  
 Estefania Zapata  
 Paralegal at Metcalfe & Atkinson, LLC

SWORN and SUBSCRIBED TO  
 This 20<sup>th</sup> day of March, 2024



NOTARY PUBLIC FOR FLORIDA  
 My Commission Expires: Feb 02, 2024



## **EXHIBIT A**

## CIVIL

### Motions

[7:20-cv-00947-DCC Does 1-9 v.](#)

[Murphy et al](#)

JURY

ERROR: Document is malformed or contains code which may cause an external action (such as launching an application). This PDF document cannot be accepted.

Click [here](#) for more information.

If you need further assistance, please contact the court.

Error File: C:\fakepath\Wisebits Ex. 2 - Response.pdf

#### Submitted Entries

File Type	Filename	Category	Description
Main Document	C:\fakepath\WIPs Motion for Protective Order .pdf	-	-
Attachment #1	C:\fakepath\Wisebits Ex. 2 - Response.pdf	Exhibit	-

[Back](#)